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9 Attorneys for Defendants
10 BARR LABORATORIES, INC., and
11 TEVA PHARMACEUTICALS USA, INC.

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

HELENE GUMBRECHT,
Plaintiff,

vs.

BAYER CORPORATION; BAYER
HEALTHCARE, LLC; BAYER
PHARMACEUTICALS
CORPORATION; BAYER
HEALTHCARE PHARMACEUTICALS,
INC.; BELEX LABORATORIES, INC.;
BERLEX, INC.; BAYER SCHERING
PHARMA AG; BAYER AG; TEVA
PHARMACEUTICALS USA, INC.;
BARR LABORATORIES, INC;
MCKESSON CORPORATION and
DOES 1 through 100, inclusive,

Defendants.

Case No. 4:10-cv-00883-PJH

**STIPULATION EXTENDING
TIME TO RESPOND TO
COMPLAINT**

Plaintiff Helene Gumbrecht ("Plaintiff") and Defendants Barr Laboratories, Inc., ("Barr") and Teva Pharmaceuticals USA, Inc., ("Teva"), by and through their respective counsel, and pursuant to Local Rule 6-1(a), enter into the following Stipulation:

WHEREAS, Plaintiff's Complaint was filed on March 1, 2010;

1 WHEREAS, Defendants Bayer Corporation, Bayer Healthcare LLC, Bayer
2 HealthCare Pharmaceuticals Inc., and McKesson Corporation removed the Complaint
3 to this Court on March 2, 2010;

4 WHEREAS, Defendants Bayer Corporation, Bayer Healthcare LLC, Bayer
5 HealthCare Pharmaceuticals Inc., and McKesson Corporation issued a letter dated
6 March 3, 2010 identifying this matter as a tag-along action in connection with MDL
7 No. 2100, pending in the United States District Court for the Southern District of
8 Illinois;

9 WHEREAS, Plaintiff filed a motion to remand the case on March 3, 2010;

10 WHEREAS, Defendants Bayer Corporation, Bayer Healthcare LLC, Bayer
11 HealthCare Pharmaceuticals Inc., and McKesson Corporation filed a motion to stay the
12 case on March 15, 2010;

13 WHEREAS, Plaintiff and Defendants Bayer Corporation, Bayer Healthcare
14 LLC, Bayer HealthCare Pharmaceuticals Inc., and McKesson Corporation filed a
15 stipulation on March 22, 2010 extending the time to answer or otherwise respond to
16 Plaintiff's Complaint for those defendants until May 7, 2010;

17 WHEREAS, responsive pleadings from Barr and Teva were due on March 23,
18 2010, but these defendants were omitted from the previous stipulation filed on March
19 22, 2010;

20 WHEREAS, an extension of time to respond to the Complaint is warranted
21 given the pending motions;

22 WHEREAS, allowing the same extension for Barr and Teva as that filed for
23 Defendants Bayer Corporation, Bayer Healthcare LLC, Bayer HealthCare
24 Pharmaceuticals Inc., and McKesson Corporation will not alter the date of any event or
25 any deadline already fixed by Court order;

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1 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE,
2 Barr and Teva shall have until May 7, 2010 to respond to Plaintiff's Complaint.
3 IT IS SO STIPULATED.

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5 Dated: April 1, 2010

ANDRUS ANDERSON LLP



Lori E. Andrus
Attorneys for Plaintiff
Helene Gumbrecht

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9 Dated: April 1, 2010

HASSARD BONNINGTON LLP

/s/ Thomas M. Frieder

Thomas M. Frieder
Attorneys for Defendants
Barr Laboratories Inc., and
Teva Pharmaceuticals USA, Inc.

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